

1 - BENJAMIN WILSON -

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK

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5 ULKU ROWE,

6 Plaintiff,

7 Case No.
8 19 Civ. 08655 (LGS) (GWG)

9 v.

10 GOOGLE LLC,

11 Defendant.

12 DATE: December 2, 2020

13 TIME: 10:21 a.m.

14 VIDEOTAPED VIDEOCONFERENCE DEPOSITION
15 OF BENJAMIN WILSON, held via Zoom, pursuant to
16 Notice, before Hope Menaker, a Shorthand Reporter
17 and Notary Public of the State of New York.

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2 A. Yes.

3 Q. Did the product management role
4 require an understanding of the challenges modern
5 enterprises faced with respect to scale, speed,
6 and user expectations?

7 MR. GAGE: Objection.

8 A. Yes.

9 Q. When you moved into the product
10 management role, did your level change?

11 A. No.

12 Q. What is your current level?

13 A. I am still an L 9. My expectation is
14 if I move into the product management role
15 officially, I will be downgraded to an L 8.

16 Q. So at this point in time, are you
17 functioning in a product management position or
18 are you functioning in the technical client lead
19 position?

20 A. Product management.

21 Q. And how long have you been
22 functioning in the product management position?

23 A. Roughly six months.

24 I -- I do need to provide a
25 clarification to that. I started the role in

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2 February, but for the first six months or so I was
3 doing project management work to solve an urgent
4 business problem; and then in I would say August,
5 mid-August, I started functioning in the product
6 management role, just so we're precise.

7 Q. And so as of February, who did you
8 report to?

9 A. Initially, well, Ros -- Roslyn
10 Litchfield.

11 Q. And what is Ms. Litchfield's
12 position?

13 A. Senior director of product
14 management.

15 Q. And as of August, who did you report
16 to?

17 A. Same person; Roslyn Litchfield.

18 Q. And, currently, who do you report to?

19 A. We just made an org change. I'm now
20 reporting to Eric Watson.

21 Q. And is Eric Watson also on the
22 product management ladder?

23 A. Yes, he is.

24 Q. And is there a reason why your ladder
25 hasn't changed product management?

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2 MR. GAGE: Objection.

3 A. Inside Google moving to the product
4 management ladder requires lot -- lots of
5 evaluations. It's stated that it's like -- it's
6 going through a brand-new interview like you were
7 a new employee -- rather or a non-Google employee
8 and you have to go through -- I've been asked to
9 go through a year of evaluation in the product
10 management role.

11 Q. Have you been give -- given any
12 indication about whether you will move over to the
13 product management ladder?

14 A. No, not yet.

15 Q. Is it your understanding that your
16 role and responsibilities will continue as they
17 are presently are if and when you do move over to
18 the product management ladder?

19 A. Yes.

20 Q. And I think you may have testified
21 that your understanding is that if and when you
22 move over to the product management ladder, your
23 level at that time may change; is that right?

24 A. Yes. I would go from an L 9 to an
25 L 8 would be my expectation.